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Attorneys for Defendant
CREDIT PAYMENT SERVICES, INC.

**IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

FLEMMING KRISTENSEN, individually,
 and on behalf of a class of similarly situated
 individuals,

Plaintiff,

v.

CREDIT PAYMENT SERVICES, INC.,
 a Nevada corporation,
 f/k/a MYCASHNOW.COM INC.,
 ENOVA INTERNATIONAL, INC.,
 an Illinois corporation,
 PIONEER FINANCIAL SERVICES, INC.,
 a Missouri corporation,
 LEADPILE LLC,
 a Delaware limited liability company, and
 CLICKMEDIA, LLC d/b/a NET1PROMOTIONS
 LLC, a Georgia limited liability company,

Defendants.

) Case No. 2:12-CV-00528-APG (PAL)
)
) **DEFENDANTS' JOINT MOTION TO**
) **EXTEND CERTAIN DEADLINES**
)
) **SPECIAL SCHEDULING**
) **REVIEW REQUESTED**

COME NOW Defendants Credit Payment Services, Inc. f/k/a MyCashNow.com, Inc. ("CPS"), Pioneer Services ("Pioneer"), LeadPile LLC ("LeadPile"), Enova International, Inc. (Enova), and ClickMedia, LLC d/b/a Net1Promotions, LLC ("ClickMedia") (collectively, "Defendants"), by and through their respective counsel, and hereby submit this Motion for Leave to Amend Certain Deadlines pursuant to the Scheduling Order (Doc. 93) entered by this Court July 23, 2013. In support of this Motion, Defendants state as follows:

1. This Court entered a Stipulated Discovery Plan and Scheduling Order on July 23, 2013 (the "Scheduling Order").

2. The Scheduling Order sets forth certain limited deadlines as to discovery issues relating to Class Certification, with an extended briefing schedule from the default rules as to class certification motions and motions for summary judgment, as agreed by the Parties at the time of submitting the proposed stipulated discovery plan and scheduling order.

3. Plaintiff filed its Motion to Certify Class (Doc 113) on October 31, 2013 ("Motion to Certify"). The Parties have fully briefed the Motion to Certify.

4. The Court granted Plaintiff's Motion to Certify on March 26, 2014 (Doc. 164).

5. An extension is appropriate to permit all parties to conduct merits discovery related to the recently certified class.

6. For the foregoing reasons, Defendants request the following extensions:

Description	Current Deadline	Proposed Deadline
Discovery Deadline	April 30, 2014	May 26, 2014 (60 days after the Court entered ruling on the Motion to Certify Class)
Deadline to Disclose Rebuttal Expert Witnesses	April 2, 2014	April 25, 2014 (30 days after the Court entered ruling on the Motion to Certify Class)
Deadline to File Dispositive Motions	May 30, 2014	July 24, 2014 (120 days after the Court entered ruling on the Motion to Certify Class)
Deadline for Filing Joint Pretrial Order and Fed. R. Civ. P. 26(a)(3) Disclosures	June 30, 2014	August 22, 2014 (150 days after the Court entered ruling on the Motion to Certify Class)

1
2 7. The extensions requested are not the result of any undue delay, bad faith or dilatory
3 motive. Good cause exists and the request is not submitted for any improper purpose. No party
4 will be prejudiced by this delay.

5 8. The extensions requested are consistent with the dates provided to the Court in the
6 March 3, 2014 Joint Status Report (Doc. 157).

7 9. Pursuant to Local Rule 26-4, Defendants state that significant discovery between the
8 parties have occurred. All parties have served and responded to written discovery requests.
9 However, on March 31, 2014, Plaintiff propounded his second set of interrogatories on CPS,
10 Pioneer, and Enova; his third set of interrogatories on LeadPile; his second set of document
11 requests on CPS, Pioneer, LeadPile, and Enova; and his first request for admissions on CPS,
12 Pioneer, LeadPile, and Enova. Therefore, this extension in the discovery deadline is sought to
13 complete this additional discovery, as well as expert witness testimony and third-party discovery.

14 10. Defendants were not able to complete discovery in the time permitted due to a number
15 of factors. First, Plaintiff continues to produce documents in this action which highlight potential
16 third-parties who may have discoverable information. Furthermore, Plaintiff has recently agreed
17 to search for additional electronically stored information ("ESI") but has not yet finished
18 producing such information. The requested extension of time to complete discovery will permit
19 Defendants the opportunity to adequately investigate any ESI produced by Plaintiff.

20 11. Defendants have conferred with Plaintiff Flemming Kristensen ("Plaintiff") regarding
21 the proposed extensions and Plaintiff will not agree to any of the requested extensions, except the
22 discovery deadline.

23 WHEREFORE, Defendants Credit Payment Services, Inc., f/k/a Mycashnow.Com Inc.,
24 Enova International, Inc., Pioneer Financial Services, Inc., Leadpile LLC, and Clickmedia, LLC
25 d/b/a Net1promotions LLC, respectfully request this Court extend the herein noted deadlines as set
26 forth in the proposed chart (paragraph 7), and such other and further relief as the Court deems

27 ...

28 ...

1 necessary, proper and just.

2 DATED: April 2, 2014

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Attorneys for Defendant Enova International, Inc.

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that on April 2, 2014, I caused the above and foregoing document entitled DEFENDANTS' JOINT MOTION TO EXTEND CERTAIN DEADLINES to be served on all counsel of record through the Court's CM/ECF system.

/s/Martin L. Welsh
An attorney for Credit Payment Services, Inc.

IT IS SO ORDERED this 4th day
of April, 2014.


Peggy A. Leen
United States Magistrate Judge